Unofficial Comment Form
Project 2014-01 Standards Applicability for Dispersed Generation Resources

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standards. The electronic comment form must be completed by December 19, 2014.

If you have questions please contact Katherine Street or by telephone at 404.446.9702.

All documents for this project are available on the project page.

Background Information
This posting solicits formal comments on the three Project 2014-01 Standards Applicability for Dispersed Generation Resources (DGR) medium-priority Reliability Standards, as identified in the draft White Paper prepared by the Project 2014-01 (Project) standards drafting team (DGR SDT).

The goal of the Project is to ensure that Generator Owners (GOs) and Generator Operators (GOPs) of dispersed power producing resources are appropriately assigned responsibility for requirements that impact the reliability of the Bulk Power System, as the characteristics of operating dispersed power producing resources can be unique. In light of the revised Bulk Electric System (BES) definition approved by the Federal Energy Regulatory Commission in 2014, the intent of this Project is generally to maintain the status quo for applicability of the standards as they have been applied over time with respect to dispersed power producing resources where the status quo does not create a reliability gap.

The DGR SDT reviewed all standards that apply to GOS and GOPs and categorized how each standard should be applied to dispersed power producing resources to accomplish the reliability purpose of the standard. The DGR SDT developed the White Paper to explain its approach, which was posted on April 17, 2014 for an informal comment period. Industry feedback on the White Paper allowed the DGR SDT to refine its approach and finalize recommended revisions to the standards. As part of this review, the DGR SDT determined that there are three medium-priority standards in which attention is required:

- PRC-001-1.1;
- PRC-019-2; and
- PRC-024-1.

Because two of the medium-priority standards have recently been revised or are undergoing revision in another current project, the DGR SDT has developed revisions to allow for different possibilities in the

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1 The terms dispersed generation resources and dispersed power producing resources are used interchangeably.
timing of regulatory approvals. When the revisions are being applied to a version that is not the last approved version of the standard or to a version that is pending regulatory approval, the version is noted with “(X)” after it. Please note that any versions of the standards posted under this project with an “X” suffix will have a version number applied at a later time in order to manage sequencing of version numbers. Please also note that NERC has recently developed a version numbering convention that dictates a different suffix, but since the subject standards were approved by the NERC Standards Committee with the “X” suffix, that convention is maintained here to avoid confusion. The intent of balloting the recommended applicability revisions separately from the technical changes that are ongoing in other projects is to provide flexibility to allow approved applicability revisions to move forward on an expedited timeline as needed to support implementation of the revised definition of the BES.

Summary of Proposed Changes
The DGR SDT’s recommended changes are limited to revising the applicability of the relevant versions of PRC-001-1.1, PRC-019-2, and PRC-024-1 to appropriately account for certain dispersed power producing resources.

The DGR SDT has posted the following standards, along with corresponding Implementation Plans:

- PRC-001-1.1(X) (clean and redlined to PRC-001-1.1)
- PRC-019-2 (clean and redlined to PRC-0019-1)
- PRC-024-1(X) (clean and redlined to PRC-024-1)
- SAR

Please note that the DGR SDT has not revised the Violation Risk Factors (VRFs) or Violation Severity Levels (VSLs) associated with the medium-priority standards because the proposed revisions do not change the reliability intent or impact any of the requirements. If the applicability recommendations are approved by industry as proposed, the DGR SDT would not seek to change the VRFs and.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

Questions

1. Do you agree with the revisions proposed in PRC-001-1.1(X) Requirement R3 part 3.1 to exclude the individual generating units of dispersed power producing resources identified through Inclusion I4 of the BES definition from this requirement? If not, please provide technical rationale for your disagreement, along with suggested language changes.

   Yes:

   No: X
Comments: Although outside of the scope of the work of this Drafting Team, R3.1, as well as all Parts of this standard should be identified as 3.1, etc., and the wording in the added text made consistent with NERC format preferences. Requirement R3.1 should be Part 3.1. Because this is a format change, it should be able to be incorporated in this revision. Also outside the scope of the SAR would be a revision to the Applicability. This standard is not applicable to the Balancing Authority and Host Balancing Authority.

Protective system in R3 and Part 3.1 should be replaced with the defined term Protection System. The reference to protective system in the Rationale for Applicability Exclusion in Requirement R3.1 should be revised accordingly.

2. Do you agree with the revisions proposed in the Facilities section of proposed PRC-019-2 to clarify that the standard is applicable to dispersed power producing resources identified through Inclusion I4 of the BES definition where voltage regulating control for the facility is performed solely at the individual resource? If not, please provide technical rationale for your disagreement, along with suggested language changes.

   Yes: X
   No:

   Comments:

3. Do you agree with the revisions proposed in PRC-024-1(X) to clarify (via footnotes 4 and 6) that Requirements R1 and R2 are applicable to both dispersed power producing resources identified through Inclusion I4 of the BES definition, as well as any aggregating equipment (potentially including non-BES equipment) from the individual resource up to the point of interconnection? If not, please provide technical rationale for your disagreement, along with suggested language changes.

   Yes: X
   No:

   Comments: We agree with the revisions proposed in footnotes 4 and 6. However, frequency and voltage protective relays require coordination with other protective relays implemented elsewhere on the BES. However, PRC-001-1.1(X) Part 3.1 is excluding coordination of protective relays for Inclusion I4 which contradicts footnotes 4 and 6.

4. Do you have any additional comments to assist the DGR SDT in further developing its recommendations?

   Yes: X
No:

Comments: Regarding PRC-024-1(X), the Rationale Box entitled Rationale for Footnotes 2 and 4 should be renamed Rationale for Requirement R1. Footnote 2 does not appear in R1, or on page 4 of the redline. The wording in the Rationale Box entitled Rationale for Footnotes 2 and 4 “...are set within the “no-trip zone” is confusing, as it could easily be interpreted to mean that relays should be set to trip within the “no-trip zone” which is a contradiction. Suggest rewording to “…are set such that the generator frequency protective relaying does not trip the applicable generating unit(s) within the “no-trip zone”...”. 